

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

FAITH INTERNATIONAL ADOPTIONS,  
a Washington State non-profit corporation;  
AMAZING GRACE ADOPTIONS, a North  
Carolina non-profit corporation; and  
ADOPT ABROAD INCORPORATED, a  
Pennsylvania non-profit corporation,

Plaintiffs,

v.

MICHAEL R. POMPEO, Secretary for the  
United States Department of State, in his  
official capacity; CARL C. RISCH,  
Assistant Secretary of State for Consular  
Affairs, in his official capacity; BETH  
PAYNE, Director of the Office of Children's  
Issues, in her official capacity; UNITED  
STATES DEPARTMENT OF STATE, and  
COUNCIL ON ACCREDITATION FOR  
CHILDREN AND FAMILY SERVICES,  
INC.,

Defendants

Case No. 2:18-CV-00731 RBL

**DECLARATION OF COREY  
GARRETT IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION**

I, Corey Garrett, hereby declare as follows:

1. I am over eighteen and am competent to make this declaration based upon  
personal knowledge unless otherwise stated.

2. In early 2013, I felt called to adopt a child from Guinea. As I learned from my  
wife Katherine, she began considering adoption in college. After our marriage, we discussed

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1 the possibility of adopting and knew that it would occur in our future. We had three biological  
2 daughters after marrying. We knew our family was not yet complete and thus, decided to begin  
3 the adoption process once they had grown older.

4 3. We have resided in Western Africa for a substantial amount of time as a  
5 missionary family. When researching various adoption programs, we decided to adopt from  
6 Guinea due to the ethical approach the country takes towards adoption. In addition, we felt a  
7 connection to Guinea due to its proximity to and shared cultural heritage with Senegal, where  
8 we currently reside. We were aware that Guinea has many orphaned children because of  
9 poverty and felt that we could provide a healthy, stable, loving environment for a child who did  
10 not have a family of its own.

11 4. After researching Faith International's Guinea program, we chose to apply. We  
12 submitted our application on October 1, 2013. We completed our home study on February 13,  
13 2014. We were approved to adopt up to three children of either gender between birth and three  
14 years of age. We wished to adopt at least two children. We were also open to considering a  
15 child with medical conditions. Once our home study was complete, we filed our immigration  
16 approval and were approved by the United States Department of Homeland Security to adopt  
17 from Guinea the summer of 2014. We compiled and submitted our dossier, then began waiting  
18 for a referral. We anticipated that this would take at least one year.

19 5. It took two years for our family to receive a referral. On December 7, 2016, we  
20 received the referrals of two male children, William and Jacob. William and Jacob were two  
21 years of age at this time. Their biological family abandoned them. We were ecstatic to receive  
22 our referral. After reviewing the referral information in detail, we accepted the referrals of both  
23 William and Jacob. We hoped that the adoption process would continue in a quick and smooth  
24 manner.

25 6. Our adoption of William and Jacob was finalized on January 16, 2018. We  
26 awaited the Hague conformity certificate and certificate of non-appeal, which were received a  
27 few weeks later. The passports for William and Jacob were then applied for in March 2018.

1           7.       We were aware that we would be able to receive custody anytime, given that  
2 our adoption decree had been issued. We purchased plane tickets and made arrangements to  
3 arrive in Guinea on April 19, 2018 to receive custody of William and Jacob. Faith  
4 International Adoptions (“FIA”), who was helping us with our adoption of William and Jacob,  
5 submitted a request for a visa interview to take place on May 2, 2018 or May 9, 2018. We  
6 were incredibly excited that this time had finally come.

7           8.       On March 30, 2018, we received an email notification from FIA that the  
8 Council on Accreditation (“COA”) had just notified FIA that COA could not review the  
9 information that FIA had submitted for their PCR report until April 19, 2018. The failure by  
10 COA to complete the accreditation in a timely manner unfortunately would result in a lapse in  
11 FIA’s accreditation. FIA advised our family immediately that they were unable to provide any  
12 further Hague adoption services for our family. As we had already completed our adoption, no  
13 Hague adoption services remained. However, FIA advised our family that we should still  
14 utilize a new primary provider to oversee the remainder of our process including the visa  
15 interview. FIA began the process of identifying a new primary provider for our family right  
16 away.

17           9.       All Blessings International agreed to act as the primary provider for our family  
18 due to the lapse of Faith International’s accreditation. We completed the necessary application  
19 and contracts with their agency in the beginning of April 2018. FIA advised the US Embassy  
20 in Dakar, Senegal, that All Blessings International would be serving as the primary provider  
21 on behalf of our family. FIA also asked that the US Embassy in Dakar provide confirmation of  
22 the visa interview to All Blessings and our family. All Blessings required a \$2,500.00 fee. It  
23 was necessary for our family to fundraise for these new adoption costs.

24           10.      We traveled and received custody of Jacob and William on April 24, 2018. We  
25 still had not received confirmation of our visa interview from the Embassy, despite FIA  
26 requesting it several weeks prior. We contacted the US Embassy in Dakar, Senegal by email  
27 on several occasions. On April 17, 2018, we received an email from the US Embassy which  
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1 stated that our adoption cases had been placed in administrative review. The Embassy advised  
2 us that a visa interview would not be scheduled on our behalf until the review was complete.

3 11. We remain unsure as to why our adoption cases were placed in administrative  
4 review. We have already received the necessary approvals from the United States Government,  
5 as well as the Guinean government, including the Article 5 letter indicating the adoptions had  
6 been completed in accordance with the Hague Convention on Adoption. We inquired as to  
7 why our cases had been placed in administrative review, and questioned whether it was  
8 affiliated with the lapse of accreditation at FIA. To date, we have not received any additional  
9 information about the administrative review for our family.

10 12. Our adoption cases have now been under administrative review for seven (7)  
11 weeks. The US Embassy in Dakar will not provide information as to what they are reviewing;  
12 will not provide an approximate timeframe for completion; and will not allow us to make an  
13 appointment with their office. We are truly at a loss with regards to what they could be  
14 reviewing or looking for. On April 30, 2018, the Department of State issued the following  
15 statement to All Blessings International after they inquired about administrative review: "Since  
16 the case is in administrative processing, there is no additional information available at this  
17 time. Visa records, including information about interviews, investigations, and other matters  
18 pertaining to visa issuance or refusal, are confidential under Section 222(f) of the Immigration  
19 and Nationality Act. This law prevents the U.S. government from sharing information about  
20 the status of particular visa applications. Because each adoption case is unique, we cannot  
21 provide a specific estimate for when this step will be concluded." They continue to withhold  
22 any information pertaining to our adoption. We are continuing to wait in limbo until they  
23 provide further guidance.

24 13. However, we are also aware that not only did FIA's accreditation lapse, but the  
25 State Department treated COA's deferral of decision on FIA's accreditation renewal  
26 application as if it were a refusal to renew FIA's Hague Convention accreditation. We do not  
27 know (and cannot know, because the US Government will not tell us) for sure whether the  
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1 State Department's senseless "refusal to renew" interpretation triggered heightened scrutiny of  
2 our adoption of William and Jacob, but we do know that the extraordinary delay comes in spite  
3 of all the hard work that FIA, among others, have put in despite losing its accreditation. Had  
4 FIA at least been able to complete its reaccreditation application with COA, we do not believe  
5 we would be in this situation today.

6 I declare under penalty of perjury pursuant to the laws of the United States that the  
7 foregoing is true and correct.

8 Dated this 7<sup>th</sup> day of June 2018, in Kaffrine, Senegal.

9  
10   
Corey Garrett

**CERTIFICATE OF SERVICE**

I hereby certify that on the date below, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of the filing to all counsel of record.

DATED: June 21, 2018

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